

REMARKS

Applicant thanks the Examiner for acknowledging consideration of the references cited with the Information Disclosure Statement filed January 23, 2004, and respectfully requests that the Examiner also acknowledge consideration of the references submitted in the April 19, 2004 Information Disclosure Statement.

Status of the Application

Claims 1-30 are all the claims pending in the Application and stand rejected.

Obviousness Rejection

Claims 1-30 are rejected under 35 U.S.C. § 103(a) as being unpatentable over W3C's "Introduction to CSS2," (<http://www.w3.org/TR/REC-CSS2/intro.html#processing-model>); hereinafter "*Intro to CSS2*") in view of *Hill et al.* (US 6,023,714; hereinafter "*Hill*"). This rejection is respectfully traversed.

Claims 1 is directed to a method, within a document server, for customizing a requested document. The method includes generating a document object model (DOM), obtaining a style sheet including at least one rule directed to a target device, applying the style sheet rule to the DOM, and flattening the DOM for display of a transformed document by the target device.

Regarding independent claims 1, 11 and 21, it is alleged in the Final Office Action that *Intro to CSS2* discloses many of the features recited in the independent claims. But the Final Office Action also acknowledges that *Intro to CSS2* fails to teach or suggest "that customizing a requested document is done on the server side" (O.A., pg. 3).

In an attempt to show that these claimed features were known, the Examiner applies *Hill*, taking the position that this reference discloses “that customizing the requested document can be done on the server side as well as the client side (column 2, lines 30-34)” (O.A., pg. 3, lines 6-8).

However, the cited portion of *Hill* merely indicates that “[t]ypically, the document is an HTML document that includes embedded tags to define the structural elements of the document. The layout generator may be executed by either the client or the server.”

In view of the remaining disclosure of *Hill*, this cited portion merely indicates that a layout generator, which selects, but does not apply, style sheets, may be located either in a client or a server. *Hill* is very clear that, the actual application of that style sheet to the requested document is performed on the client side.¹

The Examiner seemingly agrees with this point, as, in the “Response to Arguments” section of the Office Action, the Examiner states that he “agrees with the applicant that within [*Hill*] server side processing is not explicitly shown” (O.A., pg. 6, lines 2-3).

However, in the Office Action, it is curiously maintained that “server-side processing of the style-sheet for the target device would clearly have been an obvious alternative embodiment (column 13, lines 16-18) to [*Hill*], especially in light of the Examiner’s provided motivation to combine.”²

¹ Applicant notes that steps 414 and 512 in FIGS. 4 and 5, respectively, and also col. 3, lines 9-20 of *Hill* indicate, *inter alia*, that the “server sends the document and the selected style sheet to the client and the client renders the document on the output device using the selected style sheet.”

² Applicant respectfully submits that the new document “brought in” by the Examiner, “Getting Started with Cascading Style Sheets,” is not prior art to this Application.

Applicant respectfully disagrees.

First, the portion of *Hill* now cited in the Final Office Action is even less supportive of the rejection than the previously cited portion, as it merely indicates that “[a]lternative embodiments will become apparent to those skilled in the art to which the present invention pertains without departing from its spirit and scope.” Such a disclosure does not teach or suggest modifying the teachings of *Hill* to achieve all the features recited in the claims.

The Final Office Action fails to identify a single portion of *Hill* that teaches or suggests any application of any rule of a style sheet to a document or DOM in a “document server” (claim 1), or in a “system for customizing a requested document for sending to a target device” (claim 11) or in a “a program storage medium” embodying instructions to perform a “method for customizing a requested document for sending to a target device” (claim 21). Therefore, the Final Office Action cannot reasonably support the position that independent claims 1, 11 and 21 are obvious, because “to establish *prima facie* obviousness of the claimed invention, all the claim limitations must be taught or suggested by the prior art.” *In re Royka*, 490 F.2d 981 (CCPA 1974).

Here, it is clear (in the Final Office Action) that the concept of application of a style sheet to a document (DOM) prior to sending it to a target device (client) is completely missing from *Hill* (and *Intro to CSS2*), and that, in fact, *Hill* discloses a completely opposite configuration.

Further, it is also clear that the alleged “motivation” stated in the Office Action cannot be used to supply such missing features. Rather, the features must be taught or suggested by the prior art to support an obviousness rejection.

Thus, Applicant respectfully submits that independent claims 1, 11 and 21 are patentable over the applied references. Further, Applicant respectfully submits that rejected dependent claims 2-10, 12-20 and 22-30 are allowable, *at least* by virtue of their dependency.

Thus, Applicant respectfully requests that the Examiner withdraw this rejection.

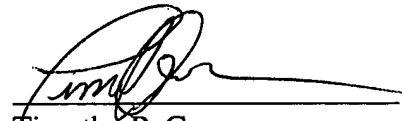
Conclusion

In view of the foregoing, it is respectfully submitted that claims 1-30 are allowable. Thus, it is respectfully submitted that the application now is in condition for allowance with all of the claims 1-30.

If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

Please charge any fees which may be required to maintain the pendency of this application, except for the Issue Fee, to our Deposit Account No. 19-4880.

Respectfully submitted,



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